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## THE MASSACHUSETTS ARCHAEOLOGICAL SOCIETY, Inc.

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Commissioner's Secretary
Office of the Secretary
Federal Communications Commission
445 12<sup>th</sup> Street SW
Washington, DC 20554

March 4, 2014

RE: Reply Comments on Federal Acceleration of Broadband Deployment by Improving Wireless Facilities Siting Policies; 47 CFR Parts 1 and 17; WT Docket No. 13-238; WC Docket No. 11-59; WT Docket No. 13-32

Dear Secretary:

Part of the mission of the Massachusetts Archaeological Society (MAS) as set forth in our Articles of Incorporation is "to conserve archaeological sites". Since 1939 the MAS has continued as a non-profit organization dedicated to preserving and studying the archaeological heritage of the Commonwealth of Massachusetts. MAS and the Robbins Museum of Archaeology foster public understanding of archaeology and Native American culture through educational programs, publications, and scientific research.

The review procedures for the installation of Distributed Antenna Systems (DAS) and small cell wireless infrastructure related to the National Environmental Policy Act (NEPA), Section 106, and review coordination that might be needed with the Advisory Council on Historic Preservation (ACHP), the National Conference of State Historic Preservation Officers (NCSHPO), and tribal organizations should not be streamlined, lessened in review, and placed into categorical exclusions that lead to the destruction of our environment and our local, state, and national heritage.

The DAS and small cell wireless infrastructure still need local, state, and federal review because of encroachment beyond the original footprint or other violations. Who is going to monitor if the DAS and small cell wireless infrastructure are given a categorical exclusion from Section 106 review, NEPA review, or other reviews? It is important that local, state, and federal authority be maintained so that the ability to review is not eliminated. We are presently losing our heritage, water supplies, wetlands, aquifers etc. from the invocation of categorical exclusions. In summary, we need our agencies and others (i.e. the Environmental Protection Agency, ACHP, NCSHPO, tribal organizations, state departments of environmental protection, conservation commissions etc.) at the local state, and federal levels to maintain their authority and ability to review in these types of installations. Thank you for your consideration.

Sincerely,

Alan J. Smith

Alan F. Smith, Chair

Site Conservation and Legislative Action Committee

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